

LOCAL BANKRUPTCY FORM 9013-3

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

Dale R. Packard

CHAPTER 13

CASE NO. 1 - 20 .bk- 02533-HWV

Debtor(s)

Fay Servicing, LLC as servicer for U.S. Bank
National Association, not in its individual capacity
but solely as Trustee for the NRZ Pass-Through
Trust XVIII

ADVERSARY NO. - .ap-
(if applicable)

Plaintiff(s)/Movant(s)

vs.

Dale R. Packard
Kimbra J. Sheaffer
aka Kimbra J. Packard, Co Debtor
Jack N Zaharopoulos, Trustee

Nature of Proceeding: Motion for Relief

from Stay Co-Debtor Stay & In Rem Relief

Defendant(s)/Respondent(s)

Document #: 51

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE¹

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.²

Reason for the continuance.

Parties are working on a possible settlement of Motion for Relief from the Automatic Stay.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: August 9, 2021

/s/ Lorraine Gazzara Doyle

Attorney for Fay Servicing, LLC

Name: Lorraine Gazzara Doyle

Phone Number: (212) 471-5100

¹ No alterations or interlineations of this document are permitted.